

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: Patricia A Whitson

Debtor

) Case no. 23-04091  
)  
) Chapter 13  
) Judge: A. Benjamin Goldgar  
)

Patricia A Whitson  
15 Peace Blvd  
Wauconda, IL 60084

GERACI LAW LLC  
55 E Monroe #3400  
Chicago, IL 60603

BCU  
340 N Milwaukee Ave.  
Vernon Hills, IL 60061

**NOTICE OF MOTION**

Please take notice that on Friday, April 12, 2024 at 9:15 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, either in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn St., Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is **160 817 7512** and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

Glenn Stearns, Chapter 13  
Trustee  
801 Warrenville Road, Suite  
650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Glenn Stearns  
\_\_\_\_\_  
For: Glenn Stearns, Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
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**CERTIFICATE OF SERVICE**

I, Scott Burknep, certify [if an attorney]/ declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown below at the address shown and by the method indicated on March 11, 2024.

GERACI LAW LLC  
55 E Monroe #3400  
Chicago,IL 60603

via CM/ECF

Patricia A Whitson  
15 Peace Blvd  
Wauconda, IL 60084

U.S. mail

BCU  
340 N Milwaukee Ave.  
Vernon Hills, IL 60061

U.S. mail

Glenn Stearns, Chapter 13  
Trustee  
801 Warrenville Road, Suite  
650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Scott Burknep  
\_\_\_\_\_  
For: Glenn Stearns, Trustee

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**OBJECTION TO CLAIM # 5**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests disallowance of the above referenced claim pursuant to 11 U.S.C. Section 502(b) and in support thereof, states the following:

1. On March 28, 2023 the Debtor filed a petition under Chapter 13.
2. The bar date for non-governmental creditors to file claims was 6/6/2023.
3. BAXTER CREDIT UNION filed a claim on June 07, 2023 (# 5 on PACER) in the amount of \$22,347.18; the claim was filed after the claims bar date.
4. Pursuant to §502(b)(9) if an objection is made to a claim that was filed after the applicable bar date it must be disallowed as not timely filed.

WHEREFORE, the Trustee prays that said late filed claim of Baxter Credit Union be disallowed, and for such other and further relief as this court deems proper.

Respectfully Submitted;

/s/ Glenn Stearns

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

For: Glenn Stearns, Trustee